

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 00-0438

SUPPLEMENTAL TESTIMONY

OF

DONALD L. RICHARDSON

ON BEHALF OF

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY

d/b/a AmerenCIPS

**Springfield, Illinois
March 23, 2001**

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Q. Please state your name and business address.

A. My name is Donald L. Richardson and my business address is 1901 Chouteau Avenue, St. Louis, Missouri.

Q. Are you the same Donald Richardson who filed direct testimony in this matter?

A. Yes, I am.

Q. What is the purpose of your testimony?

A. To address questions raised during the evidentiary hearing of this matter that was held on March 8, 2001. Specifically, Hearing Examiner Jones inquired as to the general timeline for remediation of the manufactured gas plant (“MGP”) sites identified in my direct testimony.

25 **Q. Please describe the Company's current projection as to remediation activities**
26 **and costs.**

27 A. All of the sites have been entered into the Illinois Environmental Protection
28 Agency's ("IEPA") Site Remediation Program. As part of that program, IEPA
29 will have the opportunity to comment on the Company's investigation reports and
30 remediation plans. The Company's overall goal with respect to each site is to
31 receive a "no further action" ("NFR") letter from IEPA. Because of the iterative
32 nature of this approach, the Company cannot provide a precise estimate as to
33 when its MGP sites will be remediated.

34 In order to properly manage its internal and external resources, the
35 Company has ranked the MGP sites in terms of priority. The current goal is to
36 perform a site remediation of the CIPS sites every other year with the so-called
37 "off-year" being devoted to site specific investigation activities. However, the
38 Environmental Safety and Health Department is also responsible for coordinating
39 and managing the cleanup of MGP sites for Union Electric Company, d/b/a
40 AmerenUE. As a consequence, the order and timing of the site remediations must
41 be balanced between the two companies.

42 **Q. Please articulate the Company's current plans with respect to each of the**
43 **MGP sites.**

44 A. **Taylorville:** Soil contamination at the site has been successfully remediated.
45 Groundwater remediation is ongoing and will be re-evaluated by U.S.E.P.A. in
46 2005. Annual costs associated with this site are approximately \$350,000.

47 **Du Quoin**: Site remediation has been complete and the IEPA has issued a
48 No Further Action (NFA) letter for the site under its Site Remediation Program
49 (SRP) a voluntary cleanup program. AmerenCIPS' share of the remediation costs
50 at the Du Quoin site was approximately \$1.2 million.

51 **Beardstown**: The Company is currently conducting soil remediation activities at
52 the Beardstown site and such activities should be concluded later this summer. A
53 risk-based approach is being utilized for the site remediation under the SRP with
54 oversight provided by the IEPA. The Company does not presently anticipate that
55 groundwater remediation will be required, although continued monitoring will be
56 necessary in an attempt to demonstrate natural attenuation. The soil removal
57 activities are being conducted under a temporary enclosure (or dome). Exhaust
58 air is treated before being released into the environment utilizing an activated
59 carbon system. The remediation activities are expected to cost approximately \$5
60 million.

61 **Canton**: The site investigation is substantially complete as well as a portion of the
62 remediation design work. The remediation will include several underground
63 structures containing FMGP residuals (including coal tar) as well as impacted
64 surrounding soils, and stream sediments in the adjacent Big creek. Continued
65 ground water monitoring will be necessary as impact is indicated offsite and
66 remediation is likely. The use of the temporary enclosure is anticipated during the
67 soil excavation activities. The cost of remediation activities are expected to range
68 from \$3.5 to \$4.5 million. The Company has preliminarily scheduled such
69 activities to occur in 2002-2003.

70 **Murphysboro**: There are two FMGP facilities located in this city and both have
71 been the subjects of recent investigation activities. Site investigation activities are
72 being directed by Commonwealth Edison and Northern Illinois Gas Company as
73 the site histories and ownership records indicate the operation of both facilities
74 took place during their ownership. Both properties are currently owned by
75 AmerenCIPS. Commonwealth Edison is taking the lead on these site
76 investigation activities. The remediation of the first site should commence in
77 2002-2003 with remediation of the second site commencing in 2003-2004. Our
78 share of the cleanup cost is expected to be less than \$1 million.

79 **Hoopeston, Charleston, Macomb, Quincy, Mattoon, Paris, Pana, Shelbyville**:

80 These sites have been the subject of limited preliminary assessments or other site
81 activities by consultants/contractors on behalf of AmerenCIPS, which indicate the
82 potential for impact from the FMGP operations exists. The Company owns all
83 except Mattoon, Quincy and Shelbyville. The Company intends to commence
84 further site investigations in 2002. It is premature to estimate cleanup costs or
85 specific time-lines associated with these sites. However, Hoopeston will probably
86 be addressed after Canton and before the remaining above-listed sites.

87 Streamlining of the investigation process and the use of Illinois Tiered Approach
88 to Correction Action (TACO) have significantly reduced cost. Current
89 investigation costs typically range from \$100,000 to \$300,000 depending on site
90 conditions.

92 **Q. Does this conclude your testimony?**

93 A. Yes, it does.